UNITED STATES DISTRICT COURT	
SOUTHERN DISTRICT OF NEW YOR	K

LAVASTONE CAPITAL LLC,

Plaintiff,

14 Civ. 7139 (JSR)

-against-

COVENTRY FIRST LLC et al.,

Defendants.

DECLARATION OF JEFFERSON E. BELL IN SUPPORT OF PLAINTIFF LAVASTONE CAPITAL LLC'S MOTION FOR SUMMARY JUDGMENT AS TO LIABILITY

I, JEFFERSON E. BELL, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

- 1. I am an attorney licensed to practice law in the State of New York and before this Court. I am an associate in the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Plaintiff Lavastone Capital LLC ("Lavastone") in the above-captioned matter. I am personally familiar with the facts set forth herein. I make this declaration in support of Lavastone's Motion for Summary Judgment as to Liability.
- 2. Attached hereto as Exhibit 1 is a true and correct copy of the declaration of Dr. Joseph R. Mason, dated May 15, 2015, and, as exhibit A thereto, the expert report of Dr. Joseph R. Mason, dated March 27, 2015.
- 3. Attached hereto as Exhibit 2 is a true and correct copy of the Life Settlements Summary PowerPoint presentation, dated May 21, 2013, produced to Defendants by Lavastone and bearing the Bates number LAV02849456.

- 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the deposition of Constance Buerger, dated March 24, 2015.
- 5. Attached hereto as Exhibit 4 is a true and correct copy of an American International Group Risk Finance PowerPoint presentation entitled "AIG LS Securitization I LLC," produced to Defendants by Lavastone and bearing the starting Bates number LAV02371843.
- 6. Attached hereto as Exhibit 5 is a true and correct copy of the declaration of Edward M. Stroz, dated May 15, 2015, and, as exhibit A thereto, the expert report of Edward M. Stroz, dated March 27, 2015.
- 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the deposition of Krista Buerger, dated March 25, 2015.
- 8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the trial transcript of *Ritchie Risk-Linked Strategies Trading (Ireland) v. Coventry First LLC*, No. 09-CV-1086 (S.D.N.Y. 2013), dated November 12, 2013 and December 4, 2013.
- 9. Attached hereto as Exhibit 8 is a true and correct copy of a professional biography of Alan Buerger, produced to Lavastone by Defendants and bearing the Bates number CF-04484722.
- 10. Attached hereto as Exhibit 9 is a true and correct copy of a professional biography of Constance Buerger, produced to Lavastone by Defendants and bearing the Bates number CF-04484846.
- 11. Attached hereto as Exhibit 10 is a true and correct copy of a professional biography of Alan Buerger, produced to Lavastone by Defendants and bearing the starting Bates number CF-04484728.

- 12. Attached hereto as Exhibit 11 is a true and correct copy of the biography of Constance Buerger, produced to Lavastone by Defendants and bearing the Bates number CF-04484853.
- 13. Attached hereto as Exhibit 12 is a true and correct copy of a May 21, 2006 invitation from Alan Buerger to Dave Fields, Marty Scherzer, and Bill Taylor, to "Life Settlements and the Future of the Secondary Market for Life Insurance," produced to Defendants by Lavastone and bearing the starting Bates number LAV02819630.
- 14. Attached hereto as Exhibit 13 is a true and correct copy of a December 3, 2008 email attaching, *inter alia*, Coventry's Standard & Poor's report, and Coventry's AM Best Presentation, produced to Lavastone by Defendants and bearing the starting Bates number CF-04559211.
- 15. Attached hereto as Exhibit 14 is a true and correct copy of a March 30, 2011 email exchange between Alan Buerger, Neal Jacobs and Scott Willkcomm, with the subject line "RE: Evercore Call," produced to Lavastone by Defendants and bearing the starting Bates number CF-04842235.
- 16. Attached hereto as Exhibit 15 is a true and correct copy of a professional biography of Reid Buerger, produced to Lavastone by Defendants and bearing the Bates number CF-04486706.
- 17. Attached hereto as Exhibit 16 is a true and correct copy of a professional biography of Reid Buerger, produced to Lavastone by Defendants and bearing the Bates number CF-04486707.

- 18. Attached hereto as Exhibit 17 is a true and correct copy of a professional biography of Reid Buerger, produced to Lavastone by Defendants and bearing the Bates number CF-04486702.
- 19. Attached hereto as Exhibit 18 is a true and correct copy of a professional biography of Reid Buerger, produced to Lavastone by Defendants and bearing the Bates number CF-04486704.
- 20. Attached hereto as Exhibit 19 is a true and correct copy of a professional biography of Reid Buerger, produced to Lavastone by Defendants and bearing the Bates number CF-04486705.
- 21. Attached hereto as Exhibit 20 is a true and correct copy of a professional biography of Krista Lake, produced to Lavastone by Defendants and bearing the Bates number CF-04486308.
- 22. Attached hereto as Exhibit 21 is a true and correct copy of excerpts of the deposition of James Dodaro, dated April 20, 2015.
- 23. Attached hereto as Exhibit 22 is a true and correct copy of excerpts of the deposition of Reid Buerger, dated April 10, 2015.
- 24. Attached hereto as Exhibit 23 is a true and correct copy of excerpts of the deposition of David Beckelman, dated April 30, 2015.
- 25. Attached hereto as Exhibit 24 is a true and correct copy of excerpts of the deposition of Neal Jacobs, dated April 2, 2015.
- 26. Attached hereto as Exhibit 25 is a true and correct copy of a September 22, 2011 email exchange among Jim Dodaro, Mark Sadowski, Amy Aquilino, Ben Groverman and Mark

Keshgegian, copying Gary Kuchera, with the subject line "RE: LSTII," produced to Lavastone by Defendants and bearing the starting Bates number CF-04706610.

- 27. Attached hereto as Exhibit 26 is a true and correct copy of the Miravast Organizational Chart, dated as of January 5, 2015, produced to Lavastone by Miravast and bearing the Bates number MV-0000299.
- 28. Attached hereto as Exhibit 27 is a true and correct copy of excerpts of the deposition of William Taylor, dated April 15, 2015.
- 29. Attached hereto as Exhibit 28 is a true and correct copy of an Organizational Chart, dated as of September 19, 2014, produced to Lavastone by Defendants and bearing the starting Bates number CF-04486921.
- 30. Attached hereto as Exhibit 29 is a true and correct copy of excerpts of the deposition of Alan Buerger, dated April 28, 2015.
- 31. Attached hereto as Exhibit 30 is a true and correct copy of the Amended and Restated Limited Liability Company Agreement of LST II LLC, dated as of April 2006, produced to Lavastone by Defendants and bearing the starting Bates number CF-04487076.
- 32. Attached hereto as Exhibit 31 is a true and correct copy of a professional biography of Alan Buerger, produced to Lavastone by Defendants and bearing the Bates number CF-04484722.
- 33. Attached hereto as Exhibit 32 is a true and correct copy of the Amended and Restated Limited Liability Company Agreement of Coventry First LLC, dated September 20, 2001, produced to Lavastone by Defendants and bearing the starting Bates number CF-04487029.

- 34. Attached hereto as Exhibit 33 is a true and correct copy of Defendants' Objections and Responses to Plaintiff's Requests for Admissions, dated May 4, 2015.
- 35. Attached hereto as Exhibit 34 is a true and correct copy of the declaration of Kevin M. Glowacki, dated March 27, 2015, and, as exhibit A thereto, the expert report of Kevin M. Glowacki, dated March 27, 2015.
- 36. Attached hereto as Exhibit 35 is a true and correct copy of the Amended and Restated Limited Liability Company Agreement of LST I LLC, dated as of October 11, 2005, produced to Lavastone by Defendants and bearing the starting Bates number CF-04487055.
- 37. Attached hereto as Exhibit 36 is a true and correct copy of a May 29, 2009 email exchange among Marty Scherzer, James Alexander and Alan Buerger, with the subject line "Fw: Consent re Investment Bank Interviews," produced to Defendants by Lavastone and bearing the starting Bates number LAV04070068.
- 38. Attached hereto as Exhibit 37 is a true and correct copy of the Financial Analysis Procedure Guide, produced to Lavastone by Defendants and bearing the starting Bates number CF-04485905.
- 39. Attached hereto as Exhibit 38 is a true and correct copy of a Tripartite Entitlement Order associated with COV ID 69714, dated November 24, 2009, produced to Lavastone by Defendants and bearing the starting Bates number CF-00029001.
- 40. Attached hereto as Exhibit 39 is a true and correct copy of the Tripartite

 Entitlement Order signed by Coventry and the AIG Life Settlements Titling Trust, dated January

 26, 2010, along with the associated Disbursement Schedule, for COV ID 69714, produced to

 Lavastone by Defendants and bearing the starting Bates number CF-00028994.

- 41. Attached hereto as Exhibit 40 is a true and correct copy of a Coventry Administrative System ("CAS") note produced to Defendants by Lavastone and bearing the Bates number CF-04471744.
- 42. Attached hereto as Exhibit 41 is a true and correct copy of a CAS note produced to Defendants by Lavastone and bearing the Bates number CF-04472704.
- 43. Attached hereto as Exhibit 42 is a true and correct copy of a transmittal letter attaching a Disbursement Schedule and a Tripartite Entitlement Order associated with COV ID 43977, produced to Lavastone by Defendants and bearing the starting Bates number CF-00212636.
- 44. Attached hereto as Exhibit 43 is a true and correct copy of a September 18, 2009 email exchange between Peggy Lyon and Krista Buerger, with the subject line "RE: Chartis Audit Findings," produced to Lavastone by Defendants and bearing the starting Bates number CF-04814402.
- 45. Attached hereto as Exhibit 44 is a true and correct copy of an August 2-17, 2010, and July 12, 2012 email exchange among Peggy Lyon, Krista Buerger and Pierre Choute, copying Raymond Ludwicki, Edward O'Leary, Junior Coach, Sonny Modi, and Jack Switzer, with the subject line "RE: Coventry Audit 2010 -Engagement Letter and Document Request," produced to Lavastone by Defendants and bearing the starting Bates number CF-04769460.
- 46. Attached hereto as Exhibit 45 is a true and correct copy of a September 18, 2009 email from Krista Buerger to Reid Buerger, with the subject line "Response," produced to Lavastone by Defendants and bearing the Bates number CF-04562076.
- 47. Attached hereto as Exhibit 46 is a true and correct copy of a July 2, 2008 email exchange among Alan Buerger, Reid Buerger and Krista Buerger, with the subject line "RE: AIG

Audit Follow-up," produced to Lavastone by Defendants and bearing the starting Bates number CF-04826600.

- 48. Attached hereto as Exhibit 47 is a true and correct copy of excerpts from the deposition of David N. Fields, dated May 4, 2015.
- 49. Attached hereto as Exhibit 48 is a true and correct copy of a Memorandum from Jim Dodaro to File, copying Alan Buerger, Reid Buerger, Constance Buerger, Al Lurty and Jack Kettler, dated June 6, 2001, with the subject line "Meeting with AIG on June 4, 2001, regarding partnership structure," produced to Lavastone by Defendants and bearing the starting Bates number CF-04894802.
- 50. Attached hereto as Exhibit 49 is a true and correct copy of an October 4, 2001, email from Brenda Dieck to several others, with the subject line "Execution Versions of OMM Documents," produced to Defendants by Lavastone and bearing the starting Bates number LAV02814358.
- 51. Attached hereto as Exhibit 50 is a true and correct copy of the Life Settlement Policies Origination Agreement by and among Montgomery Capital, as Originator and Seller, Coventry as Purchaser and U.S. Bank N.A. as Trustee, dated as of October 2, 2001, produced to Defendants by Lavastone and bearing the starting Bates number LAV03467560.
- 52. Attached hereto as Exhibit 51 is a true and correct copy of the Amended and Restated Life Settlement Policies Origination Agreement by and among Coventry First as Originator and Seller, Coventry Life Settlements Trust as Purchaser and U.S. Bank, N.A., as Escrow Agent, dated as of July 1, 2003, produced to Defendants by Lavastone and bearing the starting Bates number LAV03467883.

- 53. Attached hereto as Exhibit 52 is a true and correct copy of the Life Policies
 Origination Agreement between Coventry First LLC as Originator and Seller, AIG Life
 Settlements LLC as Purchaser, and U.S. Bank National Association as Fiscal Agent, dated as of
 June 29, 2006, produced to Defendants by Lavastone and bearing the starting Bates number
 LAV03466117.
- 54. Attached hereto as Exhibit 53 is a true and correct copy of the Life Policies

 Origination Agreement by and among Coventry as Originator and Seller, AIG Life Settlements
 as Purchaser, and U.S. Bank, N.A. as Fiscal Agent, dated as of January 30, 2009, produced to

 Lavastone by Defendants and bearing the starting Bates number CF-04600421.
- 55. Attached hereto as Exhibit 54 is a true and correct copy of the Amended and Restated Life Settlement Policies Origination Agreement by and among Coventry as Originator, Lavastone as Purchaser, and U.S. Bank, N.A., as Fiscal Agent, dated as of February 12, 2010, produced to Defendants by Lavastone and bearing the starting Bates number LAV03467969.
- 56. Attached hereto as Exhibit 55 is a true and correct copy of the Amended and Restated Life Settlement Policies Origination Agreement by and among Coventry as Originator, Lavastone as Purchaser, and Wells Fargo Bank, N.A., as Fiscal Agent, dated as of February 12, 2010, produced to Defendants by Lavastone and bearing the starting Bates number LAV03468044.
- 57. Attached hereto as Exhibit 56 is a true and correct copy of the Amended and Restated Life Settlement Policies Origination Agreement by and among Coventry, as Originator and Seller, Lavastone, as Purchaser, and U.S. Bank, N.A., as Escrow Agent, dated as of December 17, 2013, produced to Defendants by Lavastone and bearing the starting Bates number LAV03467624.

- 58. Attached hereto as Exhibit 57 is a true and correct copy of a July 14, 2006 email from Reid Buerger to Bill Taylor, Dave Fields and Marty Scherzer, with the subject line "Thank You," produced to Defendants by Lavastone and bearing the Bates number LAV04921921.
- 59. Attached hereto as Exhibit 58 is a true and correct copy of a June 28, 2006 email exchange between Bill Taylor and Reid Buerger, with the subject line "RE: Thank You!" produced to Defendants by Lavastone and bearing the starting Bates number LAV04110108.
- 60. Attached hereto as Exhibit 59 is a true and correct copy of a February 12-17, 2003 email exchange among Alan Buerger, Bill Taylor, Al Lurty, and Reid Buerger, copying Dave Fields and Constance Buerger, with the subject line "RE: Analysis of Hannover ALE v. ELE and version comparison," produced to Defendants by Lavastone and bearing the starting Bates number LAV04084390.
- 61. Attached hereto as Exhibit 60 is a true and correct copy of a September 20, 2002 email exchange among Bill Taylor, Krista Buerger, Angela Denardo, Ronald Topping and Edward O'Leary, with the subject line "RE: Comp Pending," produced to Defendants by Lavastone and bearing the starting Bates number LAV04100888.
- 62. Attached hereto as Exhibit 61 is a true and correct copy of a May 13-16, 2002 email exchange among Bill Taylor, Reid Buerger, Alan Buerger and Al Lurty, with the subject line "RE: POR produced to Defendants by Lavastone and bearing the starting Bates number LAV03434266.
- 63. Attached hereto as Exhibit 62 is a true and correct copy of excerpts from the deposition of Marty H. Scherzer, dated May 16, 2015.
- 64. Attached hereto as Exhibit 63 is a true and correct copy of a June 25-26, 2009 email exchange among Joshua Funt, Jim Dodaro and David Beckelman, copying Marty

Scherzer, Antonio Muniz, Stephanie Ching and Bill Taylor, with the subject line "RE: Phoenix policies," produced to Lavastone by Defendants and bearing the starting Bates number CF-04653760.

- 65. Attached hereto as Exhibit 64 is a true and correct copy of an October 10-11, 2002, email exchange between Bill Taylor and Ken Zinn, copying Reid Buerger, Alan Buerger, Richard Bernardi, Barry Green and Michael Groves, with the subject line "RE: Mortality Estimates MUR Decisions," produced to Defendants by Lavastone and bearing the starting Bates number LAV02816187.
- 66. Attached hereto as Exhibit 65 is a true and correct copy of a September 19, 2002 email exchange among Bill Taylor, Felicity Feiser, and preofferreview@coventryfinancial.com, copying Reid Buerger, with the subject line "RE: pricing," produced to Defendants by Lavastone and bearing the starting Bates number LAV03433777.
- 67. Attached hereto as Exhibit 66 is a true and correct copy of a July 23-30, 2002 email exchange among Bill Taylor, Jody Bryan, and preofferreview@coventrvfinancial.com, copying Reid Buerger, with the subject line "RE: Pre-Offer Review," produced to Defendants by Lavastone and bearing the starting Bates number LAV01452106.
- 68. Attached hereto as Exhibit 67 is a true and correct copy of a May 8, 2002 email exchange between Bill Taylor and Reid Buerger, copying Alan Buerger, with the subject line "RE: produced to Defendants by Lavastone and bearing the starting Bates number LAV03433119.
- 69. Attached hereto as Exhibit 68 is a true and correct copy of excerpts from the deposition of Diane McGovern, dated April 10, 2015.

- 70. Attached hereto as Exhibit 69 is a true and correct copy of an October 10, 2001 email from Bill Taylor to Dave Fields, copying several others, with the subject line "Life Settlements Pipeline Report," produced to Defendants by Lavastone and bearing the starting Bates number LAV03429190.
- 71. Attached hereto as Exhibit 70 is a true and correct copy of an August 9, 2002 email chain among Bill Taylor, Peggy Lyon, Edward O'Leary, Reid Buerger, and others, produced to Defendants by Lavastone and bearing the starting Bates number LAV01454834.
- 72. Attached hereto as Exhibit 71 is a true and correct copy of a February 11-12, 2004 email exchange between Bill Taylor and Michael Harris, copying Marty Scherzer, Barry Tate, David McMurray, Alan Buerger, Reid Buerger, Antonio Muniz and Ken Zinn, with the subject line "RE: PFP Example Illustrations,4," produced to Defendants by Lavastone and bearing the starting Bates number LAV04058589.
- 73. Attached hereto as Exhibit 72 is a true and correct copy of excerpts from the deposition of Eileen Decker, dated April 14, 2015.
- 74. Attached hereto as Exhibit 73 is a true and correct copy of a May 13-16, 2002 email exchange among Bill Taylor, Felicity Feiser, preofferreview@coventryfinancial.com, Reid Buerger, and Alan Buerger, with the subject line "RE: pricing," produced to Defendants by Lavastone and bearing the starting Bates number LAV03434260.
- 75. Attached hereto as Exhibit 74 is a true and correct copy of a May 22-23, 2002 email exchange among Reid Buerger, Bill Taylor, Felicity Feiser, and preofferreview@coventryfinancial.com, copying Jim Dodaro, with the subject line "RE: pricing," produced to Defendants by Lavastone and bearing the starting Bates number LAV01450251

- 76. Attached hereto as Exhibit 75 is a true and correct copy of an April 8 and May 21-22, 2002, email exchange among Bill Taylor, Reid Buerger, Benjamin Groverman, and Pre-Offer Review, with the subject line "RE: POR," produced to Defendants by Lavastone and bearing the starting Bates number LAV02799679.
- 77. Attached hereto as Exhibit 76 is a true and correct copy of an October 8, 2001 email from David Zack to several others, with the subject line "AIG/Coventry --- Sidley's Execution Versions," produced to Defendants by Lavastone and bearing the starting Bates number LAV02500895.
- 78. Attached hereto as Exhibit 77 is a true and correct copy of a November 18, 2005 email from Marco Hsu to Dave Fields and Bill Taylor attaching a draft financial review of Coventry, produced to Defendants by Lavastone and bearing the starting Bates number LAV04101050.
- 79. Attached hereto as Exhibit 78 is a true and correct copy of the Sale Documentation Package associated with COV ID 43547, produced to Lavastone by Defendants and bearing the starting Bates number CF-00205323.
- 80. Attached hereto as Exhibit 79 is a true and accurate copy of the declaration of David N. Fields, dated December 31, 2014.
- 81. Attached hereto as Exhibit 80 is a true and correct copy of a July 16, 2010 email from Neal Jacobs to Reid Buerger, Marty Scherzer, Connie Anderson, David Beckelman, and others with the subject line "Renewal of the Origination Agreement," produced to Defendants by Lavastone and bearing the starting Bates number LAV04090181.
- 82. Attached hereto as Exhibit 81 is a true and correct copy of a March 7-18, 2013 email exchange among Connie Anderson, Reid Buerger and Jeff Swiatek, copying Alan Buerger,

with the subject line "Re: In-the-box-policies," produced to Lavastone by Defendants and bearing the starting Bates number CF-04601532.

- 83. Attached hereto as Exhibit 82 is a true and correct copy of a December 2, 2007 email exchange between Jim Dodaro and Neal Jacobs, with the subject line "Re: 29030," produced to Lavastone by Defendants and bearing the starting Bates number CF-04668765.
- 84. Attached hereto as Exhibit 83 is a true and correct copy of a November 1, 2008 email exchange among Matthew Unterlack, Edward O'Leary, and Elliott Kroll, copying Marty Scherzer, David Beckelman, Connie Anderson, James Alexander, and Sonny Modi, with the subject line "FW: AIG Life Settlement Securitization," produced to Defendants by Lavastone and bearing the starting Bates number LAV04916177.
- 85. Attached hereto as Exhibit 84 is a true and correct copy of a December 11, 2008 email exchange between Anne Sanner, Kirsten Caminiti, Mary Donegan, Neal Jacobs, and others, with the subject line "FW: 77144 POR Approved with Contingencies," produced to Lavastone by Defendants and bearing the Bates number CF-04549416.
- 86. Attached hereto as Exhibit 85 is a true and correct copy of the deposition of Connie Anderson, dated April 21, 2015.
- 87. Attached hereto as Exhibit 86 is a true and correct copy of an April 25, 2008 email exchange among Diane McGovern, Bill Taylor, Marty Scherzer, Dave Fields, Stephanie Ching, Leonard Lubarsky, Socarro Hoey, and Kevin Sullivan, copying Olga Lifson, Edward O'Leary, and David Beckelman, with the subject line "FW: POR Volume," produced to Defendants by Lavastone and bearing the Bates number LAV02890633.
- 88. Attached hereto as Exhibit 87 is a true and correct copy of an August 13, 2008 email exchange among Diane McGovern, Bill Taylor, Marty Scherzer, Dave Fields, and Robert

Forant, copying Edward O'Leary, Ken Zinn and William Bostic, with the subject line "RE: Yikes--POR Backlog," produced to Defendants by Lavastone and bearing the starting Bates number LAV02892718.

- 89. Attached hereto as Exhibit 88 is a true and correct copy of a May 8-9, 2008 email exchange among Socorro Hoey, Joshua Funt, Matthew Metzinger, and Pre-Offer Review, copying POR Distribution, with the subject line "RE: LH POR 35272 Priority AAAO," produced to Lavastone by Defendants and bearing the starting Bates number CF-00306543.
- 90. Attached hereto as Exhibit 89 is a true and correct copy of an August 29 September 4, 2007 email exchange among Diane McGovern, Katie Dill, and Pre-Offer Review, copying several others, with the subject line "RE: LH POR 32129 PRIORITY AA," produced to Lavastone by Defendants and bearing the Bates number CF-01924764.
- 91. Attached hereto as Exhibit 90 is a true and correct copy of the MURS Summary, produced to Defendants by Lavastone and bearing the starting Bates number of LAV02561110.
- 92. Attached hereto as Exhibit 91 is a true and correct copy of a March 23, 2009 email from Patrick Woods to Pre-Offer Review, with the subject line "POR 79003 AA Priority," produced to Defendants by Lavastone and bearing the Bates number LAV00234622.
- 93. Attached hereto as Exhibit 92 is a true and correct copy of the life expectancy report prepared by AVS Underwriting, LLC for COV ID 79003, dated February 11, 2009, produced to Defendants by Lavastone and bearing the Bates number CF-00196862.
- 94. Attached hereto as Exhibit 93 is a true and correct copy of the life expectancy report prepared by Kenneth Zinn for COV ID 334730, dated January 8, 2009, produced to Defendants by Lavastone and bearing the Bates number CF-00196865.

- 95. Attached hereto as Exhibit 94 is a true and correct copy of the Life Expectancy Calculator for COV ID 79003, produced to Lavastone by Defendants and bearing the Bates number CF-00196860.
- 96. Attached hereto as Exhibit 95 is a true and correct copy of the Life Insurance Policy Illustration prepared by John Hancock Life Insurance Company for policy number 93398337 (COV ID 79003), produced to Lavastone by Defendants and bearing the starting Bates number CF-00196509.
- 97. Attached hereto as Exhibit 96 is a true and correct copy of the Pricing Illustration spreadsheet for COV ID 79003, produced to Lavastone by Defendants and bearing the Bates number CF-00196525.
- 98. Attached hereto as Exhibit 97 is a true and correct copy of the POR Pricing spreadsheet for COV ID 79003, produced to Lavastone by Defendants and bearing the Bates number CF-00196552.
- 99. Attached hereto as Exhibit 98 is a true and correct copy of the 2010 Origination Confidentiality Agreement, produced to Defendants by Lavastone and bearing the starting Bates number LAV03466697.
- 100. Attached hereto as Exhibit 99 a true and correct copy of the POR Short Form for COV ID 83230, produced to Defendants by Lavastone and bearing the starting Bates number LAV00226809.
- 101. Attached hereto as Exhibit 100 is a true and correct copy of a February 5, 2009 email from Laurie Hepworth to PORDistribution@Coventry.com, Lambert Heenan and Guyana Petrossian, copying Amy Reed and Krystle Hazel, with the subject line "79438 POR Approved"

with Contingencies," produced to Defendants by Lavastone and bearing the Bates number LAV01430950.

- 102. Attached hereto as Exhibit 101 is a true and correct copy of a February 5, 2009 email from Laurie Hepworth to POR Mailbox, Lambert Heenan and Guyana Petrossian, copying Amy Reed and Krystle Hazel, with the subject line "79438 POR Approved with Contingencies," produced to Lavastone by Defendants and bearing the Bates number CF-00081163.
- 103. Attached hereto as Exhibit 102 is a true and correct copy of a December 23, 2008 email from Guyana Petrossian to PORDistribution@coventry.com and Lambert Heenan, copying Andrew Carnevale, with the subject line "50155 POR Approved with Contingencies," produced to Defendants by Lavastone and bearing the Bates number LAV00207951.
- 104. Attached hereto as Exhibit 103 is a true and correct copy of a July 22, 2008 email from Diane McGovern to Andrew Carnevale, copying PORDistribution@coventry.com, Lilla Bonello, Laurie Hepworth, Krystle Hazel, and Sonia Lurie, with the subject line "POR contract ID 43977 is Approved with Contingencies," produced to Defendants by Lavastone and bearing the starting Bates number LAV00249881.
- 105. Attached hereto as Exhibit 104 is a true and correct copy of a Pre-Offer Review Certification dated September 22, 2011, produced to Defendants by Lavastone and bearing the Bates number LAV01530703.
- 106. Attached hereto as Exhibit 105 is a true and correct copy of a July 2-7, 2008 email exchange among Dennis Basgil, Socorro Hoey, and Pre-Offer Review, copying POR Distribution, with the subject line "RE: LH POR 73222 (2 of 2) Priority AA," produced to Lavastone by Defendants and bearing the Bates number CF-00507322.

- 107. Attached hereto as Exhibit 106 is a true and correct copy of the Life Policy Eligibility Criteria Waiver, signed by Socorro Hoey and dated July 7, 2008, for COV IDs 73221 and 73222, produced to Lavastone by Defendants and bearing the Bates number CF-04531678.
- 108. Attached hereto as Exhibit 107 is a true and correct copy of a September 22, 2011 email from murs-noreply@chartisinsurance.com to Cara Drago, copying PORMailbox@coventry.com, produced to Defendants by Lavastone and bearing the Bates number LAV00059119.
- 109. Attached hereto as Exhibit 108 is a true and correct copy of an April 7, 2009 email from Guyana Petrossian to PORDistribution@Coventry.com, copying Amy Reed, with the subject line "81002 POR Approved with Contingencies," produced to Defendants by Lavastone and bearing the starting Bates number LAV00178056.
- 110. Attached hereto as Exhibit 109 is a true and correct copy of a May 2, 2008 email exchange among Leonard Lubarsky, Jill Domanico, and Pre-Offer Review, copying POR Distribution, with the subject line "RE: LH POR 21092 1 of 2-PRIORITY AAA," produced to Lavastone by Defendants and bearing the starting Bates number CF-00522749.
- 111. Attached hereto as Exhibit 110 is a true and correct copy of an April 9, 2008 email exchange among Leonard Lubarsky, Erika Flanagan, and Pre-Offer Review, copying POR Distribution, with the subject line "RE: LH POR 37479 Priority AAA," produced to Lavastone by Defendants and bearing the starting Bates number CF-00424200.
- 112. Attached hereto as Exhibit 111 is a true and correct copy of the Pre-Offer Review Certification, signed by Diane McGovern and dated June 3, 2009, for COV ID 65845, produced to Lavastone by Defendants and bearing the Bates number CF-04690367.

- 113. Attached hereto as Exhibit 112 is a true and correct copy of a September 6, 2011 email from murs-noreply@chartisinsurance.com to Laura Gribok, copying POR Mailbox and AIGRF-Ops@aig.com, with the subject line "POR-24878 (Contract ID 95431) is Approved with Contingencies," produced to Lavastone by Defendants and bearing the Bates number CF-00397423.
- 114. Attached hereto as Exhibit 113 is a true and correct copy of an April 7-9, 2009 email exchange among Guyana Petroissian, Amy Reed, Leonard Lubarsky, Jody Bryan and POR Mailbox, copying Shannon McSorley, Lambert Heenan, Edward O'Leary, Eileen Decker and PORDistribution@Coventry.com, with the subject line "RE: 81002 POR Approved with Contingencies," produced to Defendants by Lavastone and bearing the starting Bates number LAV00263626.
- 115. Attached hereto as Exhibit 114 is a true and correct copy of a June 16, 2009 email from Guyana Petrossian to POR Mailbox, copying Addie Burton, with the subject line "83230 POR Approved," produced to Lavastone by Defendants and bearing the Bates number CF-00437910.
- 116. Attached hereto as Exhibit 115 is a true and correct copy of a December 2-3, 2009 email exchange between Jim Dodaro, Diane McGovern, Ben Groverman, and Andy Meyer, with the subject line "RE: ______, CFID# 85307," produced to Defendants by Lavastone and bearing the starting Bates number LAV01429230.
- 117. Attached hereto as Exhibit 116 is a true and correct copy of an Eligibility

 Certificate and a Sale Documentation Package checklist signed by Edna Barber, Vice President

 of Wells Fargo Bank, N.A., produced to Lavastone by Defendants and bearing the starting Bates

 number CF-04791175.

- 118. Attached hereto as Exhibit 117 is a true and correct copy of a March 11, 2011 email from Bill Taylor to Edward O'Leary, Marty Scherzer, David Beckelman, Diane McGovern, Eileen Decker, and others, with the subject line "RE: Metlife Purchases," produced to Defendants by Lavastone and bearing the Bates number LAV02817456.
- 119. Attached hereto as Exhibit 118 is a true and correct copy of excerpts from the deposition of Dr. Joseph R. Mason, dated May 05, 2015.
- 120. Attached hereto as Exhibit 119 is a true and correct copy of a an August 25, 2010 email from Alan Buerger to Alan Buerger attaching a document entitled "Discussion Topics related to PA and SA 8/25/2010," produced to Lavastone by Defendants and bearing the starting Bates number CF-04876622.
- 121. Attached hereto as Exhibit 120 is a true and correct copy of a February 9, 2011 email exchange between Bill Taylor and Jim Dodaro, copying several others, with the subject line "RE: MetLife Ineligible," produced to Defendants by Lavastone and bearing the starting Bates number LAV02817454.
- 122. Attached hereto as Exhibit 121 is a true and correct copy of the declaration of Neil A. Doherty, dated May 15, 2015, and, as exhibit A thereto, the expert rebuttal report of Neil A. Doherty, dated April 20, 2015.
- 123. Attached hereto as Exhibit 122 is a true and correct copy of excerpts from the deposition of Neil A. Doherty, dated May 7, 2015.
- 124. Attached hereto as Exhibit 123 is a true and correct copy of a December 24, 2009, and January 14-15, 2010 email exchange among Jim Dodaro, Shannon McSorley and Ben Groverman, with the subject line "RE: PORs," produced to Lavastone by Defendants and bearing the starting Bates number CF-04688708.

- 125. Attached hereto as Exhibit 124 is a true and correct copy of a February 15, 2008 email exchange among Jim Dodaro, Alan Buerger, Reid Buerger and Dan Zollars, copying Ben Groverman, Michael Harris and Antonio Muniz, with the subject line "RE: AIG 2008 Mortality table," produced to Lavastone by Defendants and bearing the starting Bates number CF-04828898.
- 126. Attached hereto as Exhibit 125 is a true and correct copy of a February 12-22, 2008 email exchange among Jim Dodaro, Joshua Funt, Diane McGovern, Amy Aquilino and Pre-Offer Review, copying POR Distribution, with the subject line "Re: LH POR 41616 Priority AAA," produced to Lavastone by Defendants and bearing the starting Bates number CF-04674115.
- 127. Attached hereto as Exhibit 126 is a true and correct copy of a February 14-15, 2008 email exchange among Jim Dodaro, Alan Buerger, Reid Buerger and Ben Groverman, with the subject line "RE:," produced to Lavastone by Defendants and bearing the starting Bates number CF-04828882.
- 128. Attached hereto as Exhibit 127 is a true and correct copy of a September 18, 2008 email from Shannon McSorley to Alan Buerger and Reid Buerger, copying Erika Flanagan and Jim Dodaro, with the subject line "POR Exceptions still needed," produced to Lavastone by Defendants and bearing the Bates number CF-04644574.
- 129. Attached hereto as Exhibit 128 is a true and correct copy of an internal Coventry spreadsheet, produced to Lavastone by Defendants and bearing the Bates number CF-4644575.
- 130. Attached hereto as Exhibit 129 is a true and correct copy of an April 22-23, 2009 email exchange between Joshua Funt and Reid Buerger, copying Jim Dodaro and Erika

Flanagan, with the subject line "RE: Joan Lang - PFIC SALVAGE," produced to Lavastone by Defendants and bearing the Bates number CF-04626782.

- 131. Attached hereto as Exhibit 130 is a true and correct copy of an April 25 May 17, 2012 email exchange among Antonio Muniz, Michael Harris, Reid Buerger, Alan Buerger, and others with the subject line "RE: Miravast Performance Meeting notes," produced to Lavastone by Defendants and bearing the starting Bates number CF-04598610.
- 132. Attached hereto as Exhibit 131 is a true and correct copy of a January 6-8, 2010 email exchange among Erika Flanagan, Cheryl Kidron, Andrew Poe, Ben Groverman, Reid Buerger and Alan Buerger, copying Contract Services Reviews, Jenn Calvano, Liz Sielski and Jim Dodaro, with the subject line "FW: Final Pricing Review IDH# 83882 ***Transfer from LST to AIG***," produced to Lavastone by Defendants and bearing the starting Bates number CF-04501251.
- 133. Attached hereto as Exhibit 132 is a true and correct copy of an excerpt of a Sale Documentation Package associated with COV ID 83882, including a Tripartite Entitlement Order and Disbursement Schedules, produced to Lavastone by Defendants and bearing the starting Bates number CF-00061626.
- 134. Attached hereto as Exhibit 133 is a true and correct copy of a December 18-20, 2006 email exchange among Stephanie Ching, Ben Groverman, Jared Utz and Pre-Offer Review, copying Jody Bryan, with the subject line "FW: 51148 POR Priority AA," produced to Defendants by Lavastone and bearing the starting Bates number LAV01409126.
- 135. Attached hereto as Exhibit 134 is a true and correct copy of a September 17-18,2008 email exchange among Mark Sadowski, Ben Groverman, Michael Gelbert, Shannon

McSorley, and Matt Castaldo, with the subject line, "Updated Transfer List," produced to Lavastone by Defendants and bearing the starting Bates number CF-04522489.

- 136. Attached hereto as Exhibit 135 is a true and correct copy of an October 28-29, 2009 email exchange among Matt Castaldo, Alan Buerger, and Reid Buerger, copying Contract Services Reviews, Jenn Calvano, Liz Sielski, Jim Dodaro and Erika Flanagan, with the subject line "Final Pricing Review ID#89215 & ID#89216," produced to Lavastone by Defendants and bearing the starting Bates number CF-00064302.
- 137. Attached hereto as Exhibit 136 is a true and correct copy of the parties'
 Stipulation Regarding the Transmittal of Certain Documents to the Fiscal Agents, dated March
 26, 2015.
- 138. Attached hereto as Exhibit 137 is a true and correct copy of the Tripartite

 Entitlement Order signed by Coventry and the AIG Life Settlements Titling Trust, dated August

 26, 2009, along with the associated Disbursement Schedule, for COV ID 83230, produced to

 Lavastone by Defendants and bearing the starting Bates number CF-00006496.
- 139. Attached hereto as Exhibit 138 is a true and correct copy of a Sale Documentation Package associated with the sale of COV ID 83230 to Lavastone, produced to Defendants by Lavastone and bearing the starting Bates number LAV01333261.
- 140. Attached hereto as Exhibit 139 is a true and correct copy of a change of ownership form dated July 11, 2008, produced to Lavastone by Defendants and bearing the Bates number CF-00205378.
- 141. Attached hereto as Exhibit 140 is a true and correct copy of a June 27 July 8, 2005 email exchange among Bill Taylor, Dave Fields, Edward O'Leary, Ronald Topping, Martin Scherzer, David Fitzgerald, Robert Underhill and Jill Stephenson, copying Diane McGovern,

Leonard Lubarsky, Angela Denardo, Jack Switzer and Lambert Heenan, with the subject line "RE: US Bank Visit," produced to Defendants by Lavastone and bearing the starting Bates number LAV02788638.

- 142. Attached hereto as Exhibit 141 is a true and correct copy of an August 29, 2008 email from a U.S. Bank employee to Ed O'Leary, Krystle Hazel, Eileen Decker, Cheryl Kidron, and others attaching various Tripartite Entitlement Orders, Disbursement Schedules, and Escrow Agreements, produced to Defendants by Lavastone and bearing the starting Bates number LAV01381198.
- 143. Attached hereto as Exhibit 142 is a true and correct copy of an excerpt of the Sale Documentation Package associated with COV ID 38196, including a Disbursement Schedule and a Tripartite Entitlement Order, produced to Defendants by Lavastone and bearing the starting Bates number LAV01381253.
- 144. Attached hereto as Exhibit 143 is a true and correct copy of the Tripartite

 Entitlement Order signed by Coventry and the AIG Life Settlements Titling Trust, dated August
 25, 2008, along with the associated Disbursement Schedule, for COV ID 73000, produced to

 Defendants by Lavastone and bearing the starting Bates number LAV01381259.
- 145. Attached hereto as Exhibit 144 is a true and correct copy of an August 24, 2010 email from Bill Taylor to Marty Scherzer and Edward O'Leary, with the subject line "RE: follow up to 'incomplete file' discussion with Coventry," produced to Defendants by Lavastone and bearing the Bates number LAV05044493.
- 146. Attached hereto as Exhibit 145 is a true and correct copy of an October 27-30, 2006 email exchange among Jim Dodaro, Shannon McSorley, Ben Groverman, and Financial

Underwriting, with the subject line "RE: Revised Underwriting Guidelines," produced to Lavastone by Defendants and bearing the starting Bates number CF-04687752.

- 147. Attached hereto as Exhibit 146 is a true and correct copy of the Incentive Fees Rollup spreadsheet, produced to Defendants by Lavastone and bearing the Bates number LAV05043184.
- 148. Attached hereto as Exhibit 147 is a true and correct copy of a November 6, 2007 email from Andrew Windt to Alan Buerger, Constance Buerger, Reid Buerger, Krista Buerger, Antonio Muniz, Michael Harris and Dan Zollars, copying Financial Engineers, with the subject line "Updated Pool Stats Report through 10/31/07," produced to Lavastone by Defendants and bearing the Bates number CF-04815462.
- 149. Attached hereto as Exhibit 148 is a true and correct copy of a December 20, 2006 email from Beth Hannan to Bill Taylor, Edward O'Leary, Matthew Civitano, Pai Chong and Paul Costello, with the subject line "Total", ID #40819," produced to Defendants by Lavastone and bearing the starting Bates number LAV01629527.
- 150. Attached hereto as Exhibit 149 is a true and correct copy of the Disbursement Schedule 1, submitted to U.S. Bank as Fiscal Agent on January 28, 2008, associated with the sale of COV ID 22725 to Lavastone, produced to Lavastone by Defendants and bearing the starting Bates number CF-00008590.
- 151. Attached hereto as Exhibit 150 is a true and correct copy of a Memorandum from Finance to Files, dated September 2007, with the subject line "Life settlement policies and procedures (Finance)," produced to Lavastone by Defendants and bearing the starting Bates number CF-04546842.

- 152. Attached hereto as Exhibit 151 is a true and correct copy of excerpts of the deposition of Mark Zmijewski, dated April 29, 2015.
- 153. Attached hereto as Exhibit 152 is a true and correct copy of a May 27, 2002 email from Alan Buerger to Dave Fields, copying Bill Taylor, Constance Buerger, Krista Buerger, and Reid Buerger, with the subject line "FW: AIG Compensation Proposal," produced to Lavastone by Defendants and bearing the starting Bates number CF-04633545.
- 154. Attached hereto as Exhibit 153 is a true and correct copy of a July 30, 2002 email from Bill Taylor to Dave Fields and Alan Buerger, copying Reid Buerger, with the subject line "Compensation Revisions," produced to Defendants by Lavastone and bearing the Bates number LAV02814803.
- 155. Attached hereto as Exhibit 154 is a true and correct copy of excerpts from the deposition of David F. Babbel, dated May 6, 2011.
- 156. Attached hereto as Exhibit 155 is a true and correct copy of the Disbursement Schedule 1, submitted to U.S. Bank as Fiscal Agent on September 16, 2008, associated with the sale of COV ID 62495 to Lavastone, produced to Lavastone by Defendants and bearing the starting Bates number CF-00010629.
- 157. Attached hereto as Exhibit 156 is a true and correct copy of the Tripartite Entitlement Order signed by Coventry, LST I LLC and U.S. Bank, N.A., dated September 2, 2008, along with the associated Disbursement Schedule, for COV ID 62495, produced to Lavastone by Defendants and bearing the starting Bates number CF-00010631.
- 158. Attached hereto as Exhibit 157 is a true and correct copy of the Disbursement Schedule 1, submitted to U.S. Bank as Fiscal Agent on September 16, 2008, associated with the

sale of COV ID 20849 to Lavastone, produced to Lavastone by Defendants and bearing the starting Bates number CF-00017128.

- 159. Attached hereto as Exhibit 158 is a true and correct copy of the Tripartite Entitlement Order signed by Coventry, LST I LLC and U.S. Bank, N.A., dated March 11, 2009, along with the associated Disbursement Schedule, for COV ID 20849, produced to Lavastone by Defendants and bearing the starting Bates number CF-00017130.
- 160. Attached hereto as Exhibit 159 is a true and correct copy of the Tripartite

 Entitlement Order signed by Coventry and the AIG Life Settlements Titling Trust, dated August

 27, 2009, along with the associated Disbursement Schedule, for COV ID 83497, produced to

 Lavastone by Defendants and bearing the starting Bates number CF-00029790.
- 161. Attached hereto as Exhibit 160 is a true and correct copy of the Tripartite Entitlement Order signed by Coventry, LST I LLC and Wells Fargo Bank, N.A., dated August 11, 2009, along with the associated Disbursement Schedule, for COV ID 83497, produced to Lavastone by Defendants and bearing the starting Bates number CF-00029785.
- 162. Attached hereto as Exhibit 161 is a true and correct copy of a November 23 December 1, 2011 email exchange among Michael Harris, Reid Buerger, Alan Buerger, Antonio Muniz, Jill Domanico and Neal Jacobs, copying Matthew Downing, Dan Zollars, Jim Dodaro and Tom Berry, with the subject line "RE: Coventry Revenues Report Update Confidential," produced to Lavastone by Defendants and bearing the starting Bates number CF-04815945.
- 163. Attached hereto as Exhibit 162 is a true and correct copy of a May 11, 2010 email from Alan Buerger to himself, with the subject line "Jacobs Chartis 4.27.10 Pts Agreed to Memo.docx," produced to Lavastone by Defendants and bearing the starting Bates number CF-04637877.

- 164. Attached hereto as Exhibit 163 is a true and correct copy of a March 27-28, 2010 email exchange among Neal Jacobs, Alan Buerger, Reid Buerger, Antonio Muniz, Alex Seldin, Jim Dodaro, Michael Harris, and Constance Buerger, with the subject line "RE: Meeting Report Chartis March 25th," produced to Lavastone by Defendants and bearing the starting Bates number CF-04825979.
- 165. Attached hereto as Exhibit 164 is a true and correct copy of a March 24, 2010 email from Alan Buerger to Reid Buerger, with the subject line "Documents," produced to Lavastone by Defendants and bearing the Bates number CF-04827156.
- 166. Attached hereto as Exhibit 165 is a true and correct copy of a document prepared by Neal Jacobs summarizing topics that were discussed during meetings between Lavastone and Coventry in March and April 2010, bearing the starting Bates number LAV02858364.
- 167. Attached hereto as Exhibit 166 is a true and correct copy of a September 18-19, 2007 email exchange among Mark Sadowski, Alan Buerger, Jim Dodaro, and Neal Jacobs, copying Reid Buerger, with the subject line "FW: LST," produced to Lavastone by Defendants and bearing the starting Bates number CF-04826792.
- 168. Attached hereto as Exhibit 167 is a true and correct copy of an April 29, 2011 email exchange between Bill Taylor, Reid Buerger, and Connie Anderson, copying several others, with the subject line "RE: Extended POR Expiration Dates," produced to Defendants by Lavastone and bearing the starting Bates number LAV04070461.
- 169. Attached hereto as Exhibit 168 is a true and correct copy of a September 19-20, 2002 email exchange among Bill Taylor, Reid Buerger, Gerard Berry and preofferreview@coventryfinancial.com, with the subject line "RE: Priority POR produced to Defendants by Lavastone and bearing the starting Bates number LAV04091330.

- 170. Attached hereto as Exhibit 169 is a true and correct copy of a July 16, 2012 email exchange between Connie Anderson and Bill Taylor, with the subject line "RE: Miravast," produced to Lavastone by Miravast and bearing the starting Bates number MV-00001391.
- 171. Attached hereto as Exhibit 170 is a true and correct copy of a December 28-29, 2006 email exchange between Bill Taylor and Diane McGovern, copying Leonard Lubarsky and Dave Fields, with the subject line "Re: Discussion with Ryan," produced to Defendants by Lavastone and bearing the starting Bates number LAV05043526.
- 172. Attached hereto as Exhibit 171 is a true and correct copy of a March 16-19, 2012 email exchange among Joshua Funt, Neal Jacobs, Reid Buerger, Bill Taylor and Krystle Hazel, with the subject line "FW: Model," produced to Lavastone by Defendants and bearing the starting Bates number CF-04592079.
- 173. Attached hereto as Exhibit 172 is a true and correct copy of an October 19-20, 2009 email exchange among Bill Taylor, Steven Schienvar, Ken Zinn, Marty Scherzer, and several others, copying Krystle Hazel, Edward O'Leary, and Paul Costello, with the subject line "RE: MUR information for INSCAP," produced to Defendants by Lavastone and bearing the starting Bates number LAV02779820.
- 174. Attached hereto as Exhibit 173 is a true and correct copy of a Short Form Pre-Offer Review Submission, produced to Defendants by Lavastone and bearing the starting Bates number LAV00201639.
- 175. Attached hereto as Exhibit 174 is a true and correct copy of an April 12, 2011 email exchange between Andrew Poe, Peggy Lyon, David Curran, and Jessica Bunsick, with the subject line "RE: Transfer checklist & EO," produced to Lavastone by Defendants and bearing the starting Bates number CF-04783903.

- 176. Attached hereto as Exhibit 175 is a true and correct copy of a Life Insurance Policy Purchase Agreement, dated June 30, 2009, produced to Lavastone by Defendants and bearing the starting Bates number CF-00437523.
- 177. Attached hereto as Exhibit 176 is a true and correct copy of the Tripartite Entitlement Order signed by Coventry and LST I, dated July 13, 2009, along with the associated Disbursement Schedule, for COV ID 83230, produced to Lavastone by Defendants and bearing the starting Bates number CF-00006503.
- 178. Attached hereto as Exhibit 177 is a true and correct copy of a Funding Certification dated June 8, 2009 for COV ID 81002, produced to Defendants by Lavastone and bearing the starting Bates number LAV01325279.
- 179. Attached hereto as Exhibit 178 is a true and correct copy of the Tripartite

 Entitlement Order signed by Coventry and the AIG Life Settlements Titling Trust, dated June 9,

 2009, along with the associated Disbursement Schedule, for COV ID 81002, produced to

 Lavastone by Defendants and bearing the starting Bates number CF-00006380.
- 180. Attached hereto as Exhibit 179 is a true and correct copy of the Tripartite Entitlement Order signed by Coventry and LST I, along with the associated Disbursement Schedule, for COV ID 81002, produced to Lavastone by Defendants and bearing the starting Bates number CF-00006387.
- 181. Attached hereto as Exhibit 180 is a true and correct copy of "Final Pricing Procedures," dated September 24, 2007, produced to Lavastone by Defendants and bearing the starting Bates number CF-04693623.
- 182. Attached hereto as Exhibit 181 is a true and correct copy of the expert rebuttal report of Mark E. Zmijewski, dated April 20, 2015.

- 183. Attached hereto as Exhibit 182 is a true and correct copy of a March 20-26, 2008 email exchange among Reid Buerger, Alan Buerger, and Mark Sadowski, with the subject line "Re: Final Pricing Allocation 7M+ ROP policy," produced to Lavastone by Defendants and bearing the starting Bates number CF-04647475.
- 184. Attached hereto as Exhibit 183 is a true and correct copy of a Pre-Offer Review Snapshot dated September 22, 2011, produced to Defendants by Lavastone and bearing the Bates number LAV00137513.
- 185. Attached hereto as Exhibit 184 is a true and correct copy of a pricing spreadsheet associated with COV ID 82412, produced to Lavastone by Defendants and bearing the Bates number CF-00070688.
- 186. Attached hereto as Exhibit 185 is a true and correct copy of an October 19, 2011 email exchange among Alan Buerger, Reid Buerger, Mark Keshgegian, and Contract Services with the subject line "Final Pricing Review [1882412 & 94432," produced to Lavastone by Defendants and bearing the Bates number CF-00072164.
- 187. Attached hereto as Exhibit 186 is a true and correct copy of an executed Viatical Settlement Contract between Coventry and Ted B., dated October 19, 2011, produced to Lavastone by Defendants and bearing the starting Bates number CF-0070563.
- 188. Attached hereto as Exhibit 187 is a true and correct copy of the Tripartite

 Entitlement Order and Disbursement Schedule associated with the sale of COV ID 82412 to

 LST, produced Defendants by Lavastone and bearing the starting Bates number LAV01575310.
- 189. Attached hereto as Exhibit 188 is a true and correct copy of a CAS note for COV ID 82412, dated October 14, 2011, produced to Lavastone by Defendants and bearing the starting Bates number CF-04470859.

- 190. Attached hereto as Exhibit 189 is a true and correct copy of a Tripartite Entitlement Order and Disbursement Schedule associated with the sale of COV ID 94432 to LST, dated October 20, 2011, produced to Defendants by Lavastone and bearing the starting Bates number LAV01575437.
- 191. Attached hereto as Exhibit 190 is a true and correct copy of a December 29, 2011 email from Alan Buerger to Dan Lucey copying Contract Services Reviews, Jim Dodaro, Ben Groverman, and others, with the subject line "Final Pricing Review ID#82412 **LST2 Transfer to Charts**," produced to Lavastone by Defendants and bearing the Bates number CF-00070904.
- 192. Attached hereto as Exhibit 191 is a true and correct copy of a Tripartite

 Entitlement Order and Disbursement Schedule associated with COV ID 82412, dated December

 30, 2011, produced to Lavastone by Defendants and bearing the starting Bates number CF
 00070962.
- 193. Attached hereto as Exhibit 192 is a true and correct copy of a July 2, 2008 email from Dennis Basgil to Pre-Offer Review, with the subject line "LH POR 73222 (2 of 2) Priority AA," produced to Defendants by Lavastone and bearing the Bates number LAV01802606.
- 194. Attached hereto as Exhibit 193 is a true and correct copy of a pricing spreadsheet associated with COV ID 73222, dated as of July 2, 2008, produced to Defendants by Lavastone and bearing the starting Bates number LAV1802621.
- 195. Attached hereto as Exhibit 194 is a true and correct copy of the Pre-Offer Review Certification, unsigned and undated, for COV IDs 73221 and 73222, produced to Defendants by Lavastone and bearing the Bates number LAV01802622.

- 196. Attached hereto as Exhibit 195 is a true and correct copy of the Life Policy Eligibility Criteria Waiver, unsigned and undated, for COV IDs 73221 and 73222, produced to Defendants by Lavastone and bearing the Bates number LAV01802623.
- 197. Attached hereto as Exhibit 196 is a true and correct copy of the Pre-Offer Review Certification, signed by Socorro Hoey and dated July 7, 2008, for COV ID 73222, produced to Lavastone by Defendants and bearing the Bates number CF-00021416.
- 198. Attached hereto as Exhibit 197 is a true and correct copy of a September 19, 2008 email exchange among Ben Groverman, Alan Buerger, and Reid Buerger, copying Jenn Calvano, Liz Sielski, and Contract Services Reviews, with the subject line "FW: Final Pricing Review ID#s 73221 & 73222," produced to Lavastone by Defendants and bearing the starting Bates number CF-00507539.
- 199. Attached hereto as Exhibit 198 is a true and correct copy of the Life Insurance Policy Purchase Agreement between Coventry and ______, dated September 8, 2008, for COV ID 73222, produced to Lavastone by Defendants and bearing the starting Bates number CF-00021341.
- 200. Attached hereto as Exhibit 199 is a true and correct copy of the Tripartite Entitlement Order signed by Coventry and the AIG Life Settlements Titling Trust, dated October 14, 2008, along with the associated Disbursement Schedule, for COV ID 73221, produced to Lavastone by Defendants and bearing the starting Bates number CF-00021319.
- 201. Attached hereto as Exhibit 200 is a true and correct copy of the Tripartite Entitlement Order signed by Coventry and LST I, September 24, 2008, along with the associated Disbursement Schedule, for COV ID 73222, produced to Lavastone by Defendants and bearing the starting Bates number CF-00021425.

- 203. Attached hereto as Exhibit 202 is a true and correct copy of the Pre-Offer Review Pricing spreadsheet for COV ID 73222, produced to Defendants by Lavastone and bearing the Bates number LAV00239586.
- 204. Attached hereto as Exhibit 203 is a true and correct copy of the Tripartite

 Entitlement Order signed by Coventry and the AIG Life Settlements Titling Trust, dated October

 9, 2008, along with the associated Disbursement Schedule, for COV ID 73222, produced to

 Lavastone by Defendants and bearing the starting Bates number CF-00021417.
- 205. Attached hereto as Exhibit 204 is a true and correct copy of the Disbursement Schedule 1, submitted to U.S. Bank on October 8, 2008, associated with the sale of COV ID 73222 to Lavastone, produced to Lavastone by Defendants and bearing the starting Bates number CF-00021423.
- 206. Attached hereto as Exhibit 205 is a true and correct copy of an excerpt from the Flexible Premium Adjustable Life Insurance Policy for COV ID 73222, consisting of the Life Insurance Policy Purchase Agreement, dated September 8, 2008, produced to Defendants by Lavastone and bearing the Bates number LAV01144993.
- 207. Attached hereto as Exhibit 206 is a true and correct copy of the SaleDocumentation Package Checklist and the Sale Documentation Package associated with COV ID

- 73222, dated September 22, 2011, produced to Defendants by Lavastone and bearing the starting Bates number LAV01328300.
- 208. Attached hereto as Exhibit 207 is a true and correct copy of a September 23, 2011 email from Jim Dodaro to Ben Groverman and Gary Kuchera, with the subject line "Inventory Management," produced to Lavastone by Defendants and bearing the Bates number CF-04698613.
- 209. Attached hereto as Exhibit 208 is a true and correct copy of a June 15-20, 2011 email exchange among Ben Groverman, Cara Drago, and Sara Hearn, copying Jody Bryan, with the subject line "RE: Final Pricing Checklist," produced to Lavastone by Defendants and bearing the starting Bates number CF-04523217.
- 210. Attached hereto as Exhibit 209 is a true and correct copy of a November 10-12, 2006 and December 13, 2006 email exchange among Reid Buerger, Shannon McSorley, and others, with the subject line "RE: CRP Approval Brab w/Fas," produced to Lavastone by Defendants and bearing the starting Bates number CF-04846303.
- 211. Attached hereto as Exhibit 210 is a true and correct copy of a May 7-8, 2009 email exchange among Mark Sadowski, Alan Buerger, Reid Buerger, and David Curran, copying Contract Services Reviews, Jenn Calvano, Liz Sielski, and Shannon McSorley, with the subject line "Final Pricing Review ID# 81002," produced to Lavastone by Defendants and bearing the starting Bates number CF-00438740.
- 212. Attached hereto as Exhibit 211 is a true and correct copy of a June 4-8, 2009 email exchange among Mark Sadowski, Alan Buerger, and Reid Buerger, copying Contract Services Reviews, Jenn Calvano, Liz Sielski, and Erika Flanagan, with the subject line "Final

Pricing Review – ID# 81002 – Transfer from LST to AIG," produced to Lavastone by Defendants and bearing the starting Bates number CF-00439471.

- 213. Attached hereto as Exhibit 212 is a true and correct copy of a March 23, 2009 email exchange among Andre Poe, Mark Sadowski, Reid Buerger, and Alan Buerger, copying Contract Services Reviews, Jenn Calvano, Liz Sielski, and Gary Kuchera, with the subject line "Final Pricing Review ID# 79438," produced to Lavastone by Defendants and bearing the starting Bates number CF-00081218.
- 214. Attached hereto as Exhibit 213 is a true and correct copy of a November 19, 2008 email exchange among Jim Dodaro, Ben Groverman, Reid Buerger, and Alan Buerger, copying Jenn Calvano, Liz Sielski, and Contract Services Reviews, with the subject line "Re: Final Pricing Review ID# 75598," produced to Lavastone by Defendants and bearing the starting Bates number CF-04690149.
- 215. Attached hereto as Exhibit 214 is a true and correct copy of an April 28-29, 2011 email exchange between Michael Gelbert and Alan Buerger, copying Reid Buerger, Contract Services Reviews, Liz Sielski, Jim Dodaro, Ben Groverman, and Casey Watkins, with the subject line "Re: Final Pricing Review CFID#51788--UPDATED," produced to Lavastone by Defendants and bearing the starting Bates number CF-04835454.
- 216. Attached hereto as Exhibit 215 is a true and correct copy of a February 27-28, 2007 email exchange between Jim Dodaro and Reid Buerger, with the subject line "RE: Case," produced to Lavastone by Defendants and bearing the starting Bates number CF-04625686.
- 217. Attached hereto as Exhibit 216 is a true and correct copy of a May 7-8, 2009 email exchange among Matt Castaldo, Alan Buerger, and Reid Buerger, copying Contract

- 218. Attached hereto as Exhibit 217 is a true and correct copy of an April 7, 2008 email exchange among Michael Gelbert, Jim Dodaro, Reid Buerger, and Alan Buerger, copying Contract Services Reviews and Jenn Calvano, with the subject line "FW: Final Pricing Review ID#44382," produced to Lavastone by Defendants and bearing the starting Bates number CF-04660719.
- 219. Attached hereto as Exhibit 218 is a true and correct copy of a July 29 August 2, 2010 email exchange among Michael Harris, Jim Dodaro, Reid Buerger, and Antonio Muniz, copying Alan Buerger and Dan Zollars, with the subject line "RE: Lst box," produced to Lavastone by Defendants and bearing the starting Bates number CF-04725967.
- 220. Attached hereto as Exhibit 219 is a true and correct copy of a May 28, 2010 email from Jim Dodaro to Neal Jacobs, with the subject line "Emailing Budget for LST purchases through end of 2009," produced to Lavastone by Defendants and bearing the starting Bates number CF-04667705.
- 221. Attached hereto as Exhibit 220 is a true and correct copy of a January 11 March 15, 2011 email exchange among Jim Dodaro, Erika Grenko, Alan Buerger, and Reid Buerger, with the subject line "FW: - Tertiary Policies," produced to Lavastone by Defendants and bearing the starting Bates number CF-04719738.
- 222. Attached hereto as Exhibit 221 is a true and correct copy of a July 29 August 2, 2010 email exchange among Jim Dodaro, Lesley Aronchick, Kate Foyle, Reid Buerger, Antonio

Muniz, and Michael Harris, copying Alan Buerger, with the subject line "RE: Lst box," produced to Lavastone by Defendants and bearing the starting Bates number CF-04721074.

- 223. Attached hereto as Exhibit 222 is a true and correct copy of a July 29-30, 2010 email exchange among Jim Dodaro, Lesley Aronchick, Kate Foyle, Antonio Muniz, Reid Buerger, and Michael Harris, copying Alan Buerger, with the subject line "RE: Lst box," produced to Lavastone by Defendants and bearing the starting Bates number CF-04706474.
- 224. Attached hereto as Exhibit 223 is a true and correct copy of an October 17, 2007 email from Michael Gelbert to Cheryl Kidron, with the subject line "12#31823," produced to Lavastone by Defendants and bearing the starting Bates number CF-04501545.
- 226. Attached hereto as Exhibit 225 is a true and correct copy of a September 17, 2009 email exchange between Erika Flanagan and Alan Buerger, copying Jim Dodaro, with the subject line "FW: LST Transfers," produced to Lavastone by Defendants and bearing the Bates number CF-04638587.
- 227. Attached hereto as Exhibit 226 is a true and correct copy of a September 18-19, 2008 email exchange among Antonio Muniz, Michael Harris, Reid Buerger, Alan Buerger, Charles Brinkley, Jim Dodaro, Erika Flanagan, Michael Gelbert, Mark Sadowski, and Matt Castaldo, copying Shannon McSorley, with the subject line "FW: LST Sales," produced to Lavastone by Defendants and bearing the starting Bates number CF-04600160.

- 228. Attached hereto as Exhibit 227 is a true and correct copy of an internal Coventry spreadsheet, produced to Lavastone by Defendants and bearing the Bates number CF-04600162.
- 229. Attached hereto as Exhibit 228 is a true and correct copy of a March 25, 2010 email from Dan Zollars to Alan Buerger, copying Reid Buerger, Antonio Muniz, Michael Harris, Kenneth Beck, Jim Dodaro, and Ben Groverman, with the subject line "Revised Compensation Analysis," produced to Lavastone by Defendants and bearing the starting Bates number CF-04644391.
- 230. Attached hereto as Exhibit 229 is a true and correct copy of a March 1, 2010 email exchange between Alan Buerger and Jill Domanico, copying Jim Dodaro, with the subject line "Re: - SM PAC OFFER APPROVAL," produced to Lavastone by Defendants and bearing the starting Bates number CF-04644932.
- 231. Attached hereto as Exhibit 230 is a true and correct copy of a June 11-22, 2008 email exchange among Alan Buerger, Jim Dodaro, Matthew Downing, Michael Harris, Andrea Windt, Len Sieger, and Dan McCormick, copying Rick Mason, Chris McKinney, and Antonio Muniz, with the subject line "RE: AIG Profit/Capital Report," produced to Lavastone by Defendants and bearing the starting Bates number CF-04822528.
 - 232. Exhibit 231 is intentionally omitted.
- 233. Attached hereto as Exhibit 232 is a true and correct copy of an internal Coventry spreadsheet, produced to Lavastone by Defendants and bearing the Bates number CF-04826794.
- 234. Attached hereto as Exhibit 233 is a true and correct copy of a January 6, 2008 email from Alan Buerger to Jim Dodaro, copying Neal Jacobs, with the subject line "LST to AIG.xls," produced to Lavastone by Defendants and bearing the Bates number CF-04842305.

- 235. Attached hereto as Exhibit 234 is a true and correct copy of the email attachment to Exhibit 233, produced to Lavastone by Defendants and bearing the Bates number CF-04842306.
- 236. Attached hereto as Exhibit 235 is a true and correct copy of a December 1-2, 2009 email exchange among Mark Sadowski, Jim Dodaro, Reid Buerger, and Alan Buerger, with the subject line "FW: Offer Approval 1.4M policy offer deadline 4PM," produced to Lavastone by Defendants and bearing the starting Bates number CF-04677209.
- 237. Attached hereto as Exhibit 236 is a true and correct copy of an August 25, 2009 email exchange among Michael Gelbert, Reid Buerger, and Alan Buerger, copying Contract Services Reviews, Jenn Calvano, Liz Sielski, Andrew Poe, Erika Flanagan, and Jim Dodaro, with the subject line "Final Pricing Review CFID#83230 TRANSFER," produced to Lavastone by Defendants and bearing the starting Bates number CF-00437927.
- 238. Attached hereto as Exhibit 237 is a true and correct copy of a March 4, 2009 email exchange among Mark Keshgegian, Alan Buerger, and Reid Buerger, copying Contract Services Reviews, Jenn Calvano, Liz Sielski, and Joshua Funt, with the subject line "Final Pricing Review ID#34226; ID#39829 & #44186 ***LST Transfer to AIG***," produced to Lavastone by Defendants and bearing the Bates number CF-00440925.
- 239. Attached hereto as Exhibit 238 is a true and correct copy of a July 20, 2009 email exchange among Mark Sadowski, Reid Buerger, and Alan Buerger, copying Contract Services Reviews, Jenn Calvano, Liz Sielski, Erika Flanagan, and Jim Dodaro, with the subject line "Final Pricing Review ID#79438 Transfer from LST to AIG," produced to Lavastone by Defendants and bearing the Bates number CF-00081222.

- 240. Attached hereto as Exhibit 239 is a true and correct copy of excerpts of the deposition of Richard Zalocki, dated April 29, 2015.
- 241. Attached hereto as Exhibit 240 is a true and correct copy of a March 29, 2007 email from Jack Switzer to Charlie Martens at U.S. Bank and Eric Dieterle, with the subject line "RE: 53880 & 54359," produced to Defendants by Lavastone and bearing the Bates number LAV02532438.
- 242. Attached hereto as Exhibit 241 is a true and correct copy of a March 29, 2007 email exchange between Charlie Martens, Jack Switzer, Ed O'Leary, and Russell Mosley, regarding COV IDs 53880 and 5439, produced to Defendants by Lavastone and bearing the Bates number LAV02788611.
- 243. Attached hereto as Exhibit 242 is a true and correct copy of a May 11-13, 2010 and January 18, 2011 email exchange among Neal Jacobs, Alan Buerger, Reid Buerger, Bill Taylor, and Connie Anderson, with the subject line "FW: cov ID 43977," produced to Lavastone by Defendants and bearing the starting Bates number CF-04828395.
- 244. Attached hereto as Exhibit 243 is a true and correct copy of excerpts of the deposition of Raymond Ludwicki, dated April 15, 2015.
- 245. Attached hereto as Exhibit 244 is a true and correct copy of a March 25, 2009 email from Alan Buerger to Reid Buerger and Mark Sadowski, with the subject line "Final Pricing Review ID# 66794," produced to Lavastone by Defendants and bearing the starting Bates number CF-0039479.
- 246. Attached hereto as Exhibit 245 is a true and correct copy of a medical underwriting report for COV ID 331254, dated March 4, 2009, produced to Lavastone by Defendants and bearing the starting Bates number of CF-00039771.

- 247. Attached hereto as Exhibit 246 is a true and correct copy of a November 9, 2011 email exchange among Mark Sadowski, Reid Buerger, and Alan Buerger, copying Contract Services Reviews, Layla Mowla, Kristin Rusinko, Ben Groverman, Jim Dodaro, and Erika Grenko, with the subject line "Final Pricing Review ID# 95643," produced to Lavastone by Defendants and bearing the starting Bates number CF-00146910.
- 249. Attached hereto as Exhibit 248 is a true and correct copy of a July 26, 2007 email exchange among Alan Buerger, Reid Buerger, Krista Buerger, and Mark Sadowski, copying Contract Services Reviews and Len Sieger, with the subject line "RE: Final Pricing Review ID# 62685," produced to Lavastone by Defendants and bearing the starting Bates number CF-00149491.
- 250. Attached hereto as Exhibit 249 is a true and correct copy of a September 28 October 26, 2007 email exchange among Mark Sadowski, Reid Buerger, Krista Buerger, Alan Buerger, Beth Hannan, and Peggy Lyon, copying Andrew Poe, Rich Cooper, Amy Murphy, Jordan Mueller, and Contract Services Reviews, with the subject line "Final Pricing Review ID# 29030," produced to Lavastone by Defendants and bearing the starting Bates number CF-00249948.
- 251. Attached hereto as Exhibit 250 is a true and correct copy of an internal Coventry pricing spreadsheet associated with COV ID 79438, produced to Lavastone by Defendants and bearing the Bates number CF-00081087.

- 252. Attached hereto as Exhibit 251 is a true and correct copy of a January 28 February 3, 2009 email exchange between Amy Reed and Pre-Offer Review, with the subject line "POR 79438 Priority AAA0 Update," produced to Defendants by Lavastone and bearing the Bates number LAV00231097.
- 254. Attached hereto as Exhibit 253 is a true and correct copy of the Tripartite Entitlement Order signed by Coventry and LST I, dated March 24, 2009, for COV ID 79438, produced to Lavastone by Defendants and bearing the starting Bates number CF-00081091.
- 255. Attached hereto as Exhibit 254 is a true and correct copy of a February 5 and July 7, 2009 email exchange among Jim Dodaro, Andy Meyer, Laurie Hepworth, POR Mailbox, Lambert Heenan, and Guyana Petrossian, copying Amy Reed and Krystle Hazel, with the subject line "RE: 79438 POR Approved with Contingencies," produced to Lavastone by Defendants and bearing the starting Bates number CF-04668853.
- 256. Attached hereto as Exhibit 255 is a true and correct copy of a July 10, 2009 email from Guyana Petrossian to POR Mailbox copying Jim Dodaro and Amy Reed, with the subject line "POR approved with Contingencies," produced to Lavastone by Defendants and bearing the Bates number CF-00081225.
- 257. Attached hereto as Exhibit 256 is a true and correct copy of the Tripartite

 Entitlement Order signed by Coventry and the AIG Life Settlements Titling Trust, dated July 21,

- 2009, along with the associated Disbursement Schedule, for COV ID 79438, produced to Lavastone by Defendants and bearing the starting Bates number CF-00081096.
- 258. Attached hereto as Exhibit 257 is a true and correct copy of a Sale Documentation Package Checklist and Sale Documentation Package associated with COV ID 79438, produced to Defendants by Lavastone and bearing the starting Bates number LAV01103821.
- 259. Attached hereto as Exhibit 258 is a true and correct copy of an October 2-December 10, 2008 email exchange among Bill Taylor, Jim Dodaro, Reid Buerger, Stephanie Ching, Ed O'Leary, David Beckelman, and Dave Fields with the subject line "LS Policies Purchased from the Coventry Portfolio," produced to Lavastone by Defendants and bearing the starting Bates number CF-04601772.
- 260. Attached hereto as Exhibit 259 is a true and correct copy of a September 23, 2008 email exchange among Eileen Decker, Peggy Lyon, and AIGRF-Ops, copying Edward O'Leary, with the subject line "RE: ID#43977 Transfer Sale," produced to Defendants by Lavastone and bearing the Bates number LAV00080063.
- 261. Attached hereto as Exhibit 260 is a true and correct copy of an October 2, 2008 email exchange among Reid Buerger, Alan Buerger, Jim Dodaro, and Bill Taylor, copying David Beckelman, Dave Fields and Edward O'Leary, with the subject line "Fw: LS Policies Purchased from the Coventry Portfolio," produced to Lavastone by Defendants and bearing the starting Bates number CF-04816322.
- 262. Attached hereto as Exhibit 261 is a true and correct copy of an October 2-22, 2008 email exchange between Edward O'Leary, Bill Taylor and Reid Buerger, copying David Beckelman and Dave Fields, with the subject line "RE: LS Policies Purchased from the Coventry Portfolio," produced to Defendants by Lavastone and bearing the Bates number LAV04952441.

- 263. Attached hereto as Exhibit 262 is a true and correct copy of the Disbursement Schedule 1, submitted to U.S. Bank on November 12, 2008, associated with the sale of COV ID 76852 to Lavastone, produced to Lavastone by Defendants and bearing the starting Bates number CF-01650216.
- 264. Attached hereto as Exhibit 263 is a true and correct copy of an Individual Fee Schedule, produced to Lavastone by Defendants and bearing the Bates number CF-1650562.
- 265. Attached hereto as Exhibit 264 is a true and correct copy of an internal Coventry spreadsheet entitled "Prepaid Compensation (Chartis)," produced to Lavastone by Defendants and bearing the Bates number CF-04902240.
- 266. Attached hereto as Exhibit 265 is a true and correct copy of the declaration of Philip B. Stark, dated May 15, 2015, and, as Exhibit A thereto, the expert report of Philip B. Stark, dated March 27, 2015.
- 267. Attached hereto as Exhibit 266 is a true and correct copy of the Tripartite Entitlement Order signed by Coventry and LST I, dated December 28, 2009, along with the associated Disbursement Schedule, for COV ID 85968, produced to Lavastone by Defendants and bearing the starting Bates number CF-00012887.
- 268. Attached hereto as Exhibit 267 is a true and correct copy of the Tripartite Entitlement Order signed by Coventry and the AIG Life Settlements Titling Trust, dated January 29, 2010, along with the associated Disbursement Schedule, for COV ID 85968, produced to Lavastone by Defendants and bearing the starting Bates number CF-00012878.
- 269. Attached hereto as Exhibit 268 is a true and correct copy of the Tripartite Entitlement Order signed by Coventry and LST I, dated August 17, 2007, along with the

associated Disbursement Schedule, for COV ID 25494, produced to Lavastone by Defendants and bearing the starting Bates number CF-00017217.

- 270. Attached hereto as Exhibit 269 is a true and correct copy of the Disbursement Schedule 1, submitted to U.S. Bank on August 30, 2007, associated with the sale of COV ID 25494 to Lavastone, produced to Lavastone by Defendants and bearing the starting Bates number CF-00017215.
- 271. Attached hereto as Exhibit 270 is a true and correct copy of the Financial Services Procedure Guide, produced to Lavastone by Defendants and bearing the starting Bates number CF-04544058.
- 272. Attached hereto as Exhibit 271 is a true and correct copy of a November 16, 2006 email exchange among Ben Groverman, Peggy Lyon, Cheryl Kidron, and Chrissy Remley, with the subject line "RE: final pricing," produced to Lavastone by Defendants and bearing the Bates number CF-04560138.
- 273. Attached hereto as Exhibit 272 is a true and correct copy of a February 2-3, 2005 email exchange among Ben Groverman, Jim Dodaro, Reid Buerger, Meredith McMahon, Peggy Lyon, and Cheryl Kidron, copying Krista Buerger and Alan Buerger, with the subject line "RE: ID# 25802," produced to Lavastone by Defendants and bearing the starting Bates number CF-03140070.
- 274. Attached hereto as Exhibit 273 is a true and correct copy of an October 14, 2005 email from Michael Harris to Alan Buerger, copying Kate Murphy, Andrea Windt, and Amy Murphy, with the subject line "LS Cases with Zero Comp Data for AHB," produced to Lavastone by Defendants and bearing the Bates number CF-04851838.

- 276. Attached hereto as Exhibit 275 is a true and correct copy of an October 2-18, 2008 email exchange among Alan Buerger, Jim Dodaro, Shannon McSorley, and Dave Fields, copying Erika Flanagan, with the subject line "RE: AIG exceptions needed," produced to Lavastone by Defendants and bearing the starting Bates number CF-04822751.
- 277. Attached hereto as Exhibit 276 is a true and correct copy of an April 13-17, 2007 email exchange among Krista Lake, Jim Dodaro, Chrissy Remly, Amy Murphy, Ed O'Leary, Bill Taylor, and Richard Zalocki regarding "preliminary audit findings letter coventry," produced to Lavastone by Defendants and bearing the starting Bates number of CF-04548543.
- 278. Attached hereto as Exhibit 277 is a true and correct copy of a March 30, 2011 email from Peggy Lyon to Reid Buerger and Alan Buerger, copying Krista Buerger, with the subject line "Funding Package," produced to Lavastone by Defendants and bearing the Bates number CF-04647821.
- 279. Attached hereto as Exhibit 278 is a true and correct copy of an excerpt from the Flexible Premium Adjustable Life Insurance Policy for COV ID 43977, dated August 26, 2008, produced to Defendants by Lavastone and bearing the starting Bates number LAV03769054.
- 280. Attached hereto as Exhibit 279 is a true and correct copy of a September 17, 2009 email exchange between Cheryl Kidron and Laurie Hepworth, copying Eileen Decker, with the subject line "RE: Exhibit A Transaction Terms Sheet," produced to Lavastone by Defendants and bearing the Bates number CF-04509473.

- 281. Attached hereto as Exhibit 280 is a true and correct copy of a September 17, 2009 email exchange among Cheryl Kidron, Peggy Lyon, and Laurie Hepworth, copying Eileen Decker, with the subject line "FW: Exhibit A Transaction Terms Sheet," produced to Lavastone by Defendants and bearing the Bates number CF-04745662.
- 282. Attached hereto as Exhibit 281 is a true and correct copy of a September 12, 2008 email from Peggy Lyon to Reid Buerger and Krista Buerger, with the subject line "AIG," produced to Lavastone by Defendants and bearing the Bates number CF-04753479.
- 283. Attached hereto as Exhibit 282 is a true and correct copy of a December 7-22, 2009 email exchange among Neal Jacobs, Reid Buerger, and Connie Anderson, with the subject line "RE: policy purchased from LST," produced to Lavastone by Defendants and bearing the starting Bates number CF-04610292.
- 284. Attached hereto as Exhibit 283 is a true and correct copy of an October 11, 2005 email exchange between Edward O'Leary and Peggy Lyon, copying Amy Murphy, Dave Fields, Bill Taylor, Diane McGovern, Ronald Topping, and Matthew Unterlack, with the subject line "RE: Broker's Comp Revised DS ID# 33137," produced to Defendants by Lavastone and bearing the starting Bates number LAV03439184.
- 285. Attached hereto as Exhibit 284 is a true and correct copy of an October 21-22, 2010 email exchange among Jim Dodaro, Alan Buerger, Reid Buerger, Edward O'Leary, Amy Murphy, Pierre Choute, Peggy Lyon, Junior Coach, and Liz Hauser, with the subject line "RE: Broker Comp questions," produced to Lavastone by Defendants and bearing the starting Bates number CF-04832176.
- 286. Attached hereto as Exhibit 285 is a true and correct copy of an October 21-22, 2010 email exchange among Jim Dodaro, Edward O'Leary, Peggy Lyon, Amy Murphy, Liz

Hauser, Pierre Choute, and Junior Coach, with the subject line "RE: Broker Comp questions," produced to Lavastone by Defendants and bearing the starting Bates number CF-04800880.

- 287. Attached hereto as Exhibit 286 is a true and correct copy of an April 1, 2005 and December 13, 2006 email exchange among Edward O'Leary, Bill Taylor, Jack Switzer, Sonny Modi, Robert Forant, Ronald Topping, and Raymond Ludwicki, copying Rick Pisano, with the subject line "Life Settlements 2004 Audit Report Final," produced to Defendants by Lavastone and bearing the starting Bates number LAV05048470.
- 288. Attached hereto as Exhibit 287 is a true and correct copy of a June 3, 2008 email from Richard Zalocki to Reid Buerger, copying Krista Buerger, Bill Taylor, Edward O'Leary, Raymond Ludwicki, and Junior Coach, with the subject line "Coventry First LLC 2008 MGA Audit Engagement Letter," produced to Defendants by Lavastone and bearing the Bates number LAV02507030.
- 289. Attached hereto as Exhibit 288 is a true and correct copy of a June 3, 2008 email exchange among Peggy Lyon, Krista Buerger, Reid Buerger, Jim Dodaro, Antonio Muniz, Richard Zalocki, Bill Taylor, Ed O'Leary, Raymond Ludwicki, and Junior Coach, with the subject line "Coventry First LLC 2008 MGA Audit Engagement Letter," produced to Lavastone by Defendants and bearing the starting Bates number CF-4752371.
- 290. Attached hereto as Exhibit 289 is a true and correct copy of a June 3-19, 2008 email exchange among Peggy Lyon, Benjamin Lyon, Kristin Wertz, Jim Dodaro, Antonio Muniz, Reid Buerger, and Richard Zalocki, copying Krista Buerger, Bill Taylor, Edward O'Leary, Raymond Ludwicki, and Junior Coach, with the subject line "RE: FW: Coventry First LLC 2008 MGA Audit Engagement Letter," produced to Lavastone by Defendants and bearing the starting Bates number CF-04794263.

- 291. Attached hereto as Exhibit 290 is a true and correct copy of the Memorandum from Raymond Ludwicki to Edward O'Leary, dated August 26, 2008, with the subject line "Financial / Transactional Audit of Coventry First LLC Report# MGA 08-11," produced to Defendants by Lavastone and bearing the starting Bates number LAV01504813.
- 292. Attached hereto as Exhibit 291 is a true and correct copy of a November 20, 2009 email from Connie Anderson to Marty Scherzer, with the subject line "purchases from Coventry," produced to Defendants by Lavastone and bearing the Bates number LAV03499356.
- 293. Attached hereto as Exhibit 292 is a true and correct copy of the "Exit Meeting Agenda of the Coventry Financial/Transactional Audit," dated June 27, 2008, produced to Defendants by Lavastone and bearing the Bates number LAV02823210.
- 294. Attached hereto as Exhibit 293 is a true and correct copy of a July 22, 2008 email and accompanying attachment from Richard Zalocki to Edward O'Leary, copying Bill Taylor and Raymond Ludwicki, with the subject line "Coventry Payment to Seller Testing," produced to Defendants by Lavastone and bearing the Bates number LAV03468573.
- 295. Attached hereto as Exhibit 294 is a true and correct copy of a July 30, 2008 email exchange among Reid Buerger, Krista Buerger, Alan Buerger, and Peggy Lyon, with the subject line "Re: ID#40988, #36333, #41159 Need response," produced to Lavastone by Defendants and bearing the starting Bates number CF-04827898.
- 296. Attached hereto as Exhibit 295 is a true and correct copy of a July 31, 2008 email exchange between Eileen Decker and Peggy Lyon, copying Edward O'Leary, with the subject line "RE: Transfer sales emails," produced to Defendants by Lavastone and bearing the starting Bates number LAV00078607.

- 297. Attached hereto as Exhibit 296 is a true and correct copy of an August 25 September 1, 2009 email exchange among Eileen Decker, Andrew Poe, and Edward O'Leary, copying Cheryl Kidron, Peggy Lyon and Beth Hannan, with the subject line "RE: ID# 83230 Transfer Sale," produced to Lavastone by Defendants and bearing the starting Bates number CF-00437912.
- 298. Attached hereto as Exhibit 297 is a true and correct copy of an August 28-29, 2008 email exchange among Eileen Decker, Peggy Lyon, Edward O'Leary, Krystle Hazel, Laurie Hepworth, Lilla Bonello, and Guyana Petrossian, with the subject line "FW: ID# 41485 Transfer sale," produced to Lavastone by Defendants and bearing the Bates number CF-00730985.
- 299. Attached hereto as Exhibit 298 is a true and correct copy of an August 1-9, 2011 email exchange among David Curran, Edward O'Leary, and Eileen Decker, copying Peggy Lyon, with the subject line "ID#93937 Transfer Sale," produced to Lavastone by Defendants and bearing the Bates number CF-00248521.
- 300. Attached hereto as Exhibit 299 is a true and correct copy of a November 9, 2011 email exchange among Edward O'Leary, Eileen Decker, and David Curran, copying Peggy Lyon, with the subject line "ID 89253 Transfer Sale," produced to Defendants by Lavastone and bearing the Bates number LAV00096048.
- 301. Attached hereto as Exhibit 300 is a true and correct copy of a November 19, 2009 email from Krystle Hazel to Connie Anderson, with the subject line "LST," produced to Defendants by Lavastone and bearing the Bates number LAV02519604.
- 302. Attached hereto as Exhibit 301 is a true and correct copy of a December 28, 2009 email exchange among Neal Jacobs, Reid Buerger, and Connie Anderson, with the subject line

"FW: Case purchased from LST," produced to Lavastone by Defendants and bearing the starting Bates number CF-04611338.

- 303. Attached hereto as Exhibit 302 is a true and correct copy of an October 12, 2007 email from Marco Hsu to Dave Fields, Bill Taylor, Marty Scherzer, Diane McGovern, David Beckelman, Edward O'Leary, and others, with the subject line "Risk Finance CRC Portfolio Review-Final Version," produced to Defendants by Lavastone and bearing the Bates number LAV02882376.
- 304. Attached hereto as Exhibit 303 is a true and correct copy of a July 22, 2008 email exchange between Dave Fields and Diane McGovern, copying Edward O'Leary, Krystle Hazel, Laurie Hepworth, Socorro Hoey, Leonard Lubarsky, Marty Scherzer, Eileen Decker, and others, with the subject line "RE: 43977 POR Approval Request ""," produced to Defendants by Lavastone and bearing the starting Bates number of LAV0139383.
- 305. Attached hereto as Exhibit 304 is a true and correct copy of a December 28, 2009 email exchange among Neal Jacobs, Reid Buerger, and Connie Anderson, with the subject line "FW: Case purchased from LST," produced to Lavastone by Defendants and bearing the Bates number CF-04611338.
- 306. Attached hereto as Exhibit 305 is a true and correct copy of a January 20-22, 2010 email exchange among Connie Anderson, Bill Taylor, and Neal Jacobs, with the subject line "FW: 43977," produced to Defendants by Lavastone and bearing the Bates number LAV05059926.
- 307. Attached hereto as Exhibit 306 is a true and correct copy of a January 22, 2010 email exchange between Bill Taylor and Reid Buerger, forwarded to Connie Anderson, with the

subject line "Call," produced to Defendants by Lavastone and bearing the Bates number LAV02821068.

- 308. Attached hereto as Exhibit 307 is a true and correct copy of a January 20-30, 2010 email exchange among Connie Anderson, Neal Jacobs and Bill Taylor, with the subject line "FW: 43977," produced to Defendants by Lavastone and bearing the starting Bates number LAV04099515.
- 309. Attached hereto as Exhibit 308 is a true and correct copy of a February 3, 2010 email exchange between Bill Taylor and Connie Anderson, with the subject line "Re: case 43977," produced to Defendants by Lavastone and bearing the Bates number LAV05044609.
- 310. Attached hereto as Exhibit 309 is a true and correct copy of an April 14, 2010 email exchange between Neal Jacobs and Connie Anderson, with the subject line "couple of follow up things," produced to Defendants by Lavastone and bearing the Bates number LAV0295708.
- 311. Attached hereto as Exhibit 310 is a true and correct copy of a May 11, 2010 email from Connie Anderson to Bill Taylor, with the subject line "COV ID 43977," produced to Defendants by Lavastone and bearing the starting Bates number LAV01455859.
- 312. Attached hereto as Exhibit 311 is a true and correct copy of a June 4, 2010 email exchange between Bill Taylor and Connie Anderson, copying Margaret McCourt, with the subject line "Re: case 43977," produced to Defendants by Lavastone and bearing the Bates number LAV05044557.
- 313. Attached hereto as Exhibit 312 is a true and correct copy of a September 16, 2009 email exchange among Laurie Hepworth, Charlie Martens, and Eileen Decker, with the subject

line "FW: Exhibit A," produced to Defendants by Lavastone and bearing the starting Bates number LAV05140884.

- 314. Attached hereto as Exhibit 313 is a true and correct copy of an August 26, 2009 email from Nathan Merda at Wells Fargo to Beth Hannan, Cheryl Kidron, Peggy Lyon, and others, with the subject line "83230 / Eligibility Certificate / AIG LS," produced to Lavastone by Defendants and bearing the Bates number CF-04791174.
- 315. Attached hereto as Exhibit 314 is a true and correct copy of the Fiscal Agency Agreement by and among AIG Life Settlements, as Purchaser, and Wells Fargo Bank, N.A., as Fiscal Agent, dated as of July 1, 2008, produced to Defendants by Lavastone and bearing the starting Bates number LAV03467445.
- 316. Attached hereto as Exhibit 315 is a true and correct copy of the Amended and Restated Life Settlement Policies Origination Agreement by and among Coventry as Originator, LST I, as Purchaser, and U.S. Bank, N.A., as Escrow Agent, dated as of October 11, 2005, produced to Lavastone by Defendants and bearing the starting Bates number CF-04484982.
- 317. Attached hereto as Exhibit 316 is a true and correct copy of a Memorandum from Raymond Ludwicki to Ronald Topping, dated March 21, 2005, with the subject line "2004 Financial Audit of Coventry First LLC and U.S. Bank National Association Report," produced to Defendants by Lavastone and bearing the starting Bates number LAV03509369.
- 318. Attached hereto as Exhibit 317 is a true and correct copy of a December 17-21, 2012 email exchange among Connie Anderson, Jeff Swiatek, Jim Dodaro, Alan Buerger, Reid Buerger, Antonio Muniz, Richard Pero, and Marc Milano, with the subject line "FW: Coventry policies," produced to Defendants by Lavastone and bearing the starting Bates number LAV04909933.

- 319. Attached hereto as Exhibit 318 is a true and correct copy of the Employment Agreement by and between Miravast LLC and William J. Taylor, dated January 30, 2012, produced to Lavastone by Miravast and bearing the starting Bates number MV-00000188.
- 320. Attached hereto as Exhibit 319 is a true and correct copy of a March 24, 2011 email from Marty Scherzer to Winston Chang, Weili Chen, and Peter Kambeseles, copying Anuj Bhartiya, Cory Wishengrad, and Robert Gender, with the subject line "Marty's Notes re SP Servicer Presentation FINAL.doc," produced to Defendants by Lavastone and bearing the Bates number LAV05034619.
 - 321. Exhibit 320 is intentionally omitted.
- 322. Attached hereto as Exhibit 321 is a true and correct copy of a February 26, 2012 email exchange between Connie Anderson, Neal Jacobs, James Alexander, Marty Scherzer, Jack Switzer, and David Beckelman, with the subject line "RE: Broker question," produced to Defendants by Lavastone and bearing the starting Bates number LAV04909839.
- 323. Attached hereto as Exhibit 322 is true and correct copy of a February 26-27, 2012 exchange among Neal Jacobs, Connie Anderson, Marty Scherzer, James Alexander, Jack Switzer, David Beckelman, Eileen Decker, and Edward O'Leary, with the subject line, "83618, 89253 Broker question privileged and confidential," produced to Defendants by Lavastone and bearing the starting Bates number of LAV04898821.
- 324. Attached hereto as Exhibit 323 is a true and correct copy of a February 26, 2012 email exchange among Connie Anderson, Marty Scherzer, David Beckelman, James Alexander, Jack Switzer, and Neal Jacobs, with the subject line "RE: Broker question," produced to Defendants by Lavastone and bearing the starting Bates number LAV04937049.

- 325. Attached hereto as Exhibit 324 is a true and correct copy of an April 18, 2012 email exchange between Eileen Decker and Christopher L. Young, copying Andrew R. Bartus, with the subject line "RE: Sales Doc Package," produced to Defendants by Lavastone and bearing the starting Bates number LAV01468567.
- 326. Attached hereto as Exhibit 325 is a true and correct copy of the Tripartite Entitlement Order signed by Coventry and LST II, dated April 22, 2011, along with the associated Disbursement Schedule, for COV ID 89253, produced to Lavastone by Defendants and bearing the starting Bates number CF-00007779.
- 327. Attached hereto as Exhibit 326 is a true and correct copy of the Tripartite Entitlement Order signed by Coventry and LST II, dated April 22, 2011, along with the associated Disbursement Schedule, for COV ID 83618, produced to Lavastone by Defendants and bearing the starting Bates number CF-00006982.
- 328. Attached hereto as Exhibit 327 is a true and correct copy of an April 19-20, 2011 email exchange among Reid Buerger, Alan Buerger, and Michael Gelbert, copying Contract Services Reviews, Liz Sielski, Jim Dodaro, and Ben Groverman, with the subject line "Re: Final Pricing Review CFID#83618, #89253," produced to Lavastone by Defendants and bearing the starting Bates number CF-04835397.

- 330. Attached hereto as Exhibit 329 is a true and correct copy of a Disbursement Schedule I and Disbursement Schedule II for COV ID 83618, with "Coventry First Front End Bonus/Subsidy Calculation," produced to Defendants by Lavastone and bearing the Bates number LAV00001753.
- 331. Attached hereto as Exhibit 330 is a true and correct copy of a November 14, 2011 email from Andrew Bartus of Wells Fargo to Beth Hannan, Cheryl Kidron, Laurie Hepworth, Peggy Lyon, and others, with the subject line "83618 / Eligibility Certificate / AIG LS," produced to Defendants by Lavastone and bearing the Bates number starting at LAV02516911.
- 332. Attached hereto as Exhibit 331 is a true and correct copy of a June 23, 2009 email from Guyana Pretossian to PORDistribution@Coventry.com copying Brea Sinnott, with the subject line "83618 POR Approved with Contingencies," produced to Defendants by Lavastone and bearing the Bates number starting at LAV0152660.
- 333. Attached hereto as Exhibit 332 is a true and correct copy of a December 17-27, 2012 and January 14, 2013 email exchange among Jim Dodaro, Connie Anderson, Alan Buerger, Reid Buerger, and Antonio Muniz, copying Jeff Swiatek, with the subject line "RE: Coventry policies," produced to Defendants by Lavastone and bearing the starting Bates number LAV03499423.
- 334. Attached hereto as Exhibit 333 is a true and correct copy of a May 2, 2013 email from Jeff Swiatek to Alan Buerger, with the subject line "Coventry Letter May 2, 2013," produced to Defendants by Lavastone and bearing the Bates number LAV03429663.
- 335. Attached hereto as Exhibit 334 is a true and correct copy of a Servicing and Monitoring Agreement between Lavastone Capital LLC as Purchaser and Coventry First LLC as

Servicer and Wells Fargo Bank, N.A., as Fiscal Agent, dated February 12, 2010, produced to Defendants by Lavastone and bearing the Bates number LAV03467696.

- 336. Attached hereto as Exhibit 335 is a true and correct copy of Defendants' Proposed Findings of Fact (Post-Trial Revision), *Ritchie Risk-Linked Strategies Trading (Ireland), Ltd. et al. v. Coventry First LLC et al.*, No. 09-CV-1086 (S.D.N.Y Dec. 20, 2013)).
- 337. Attached hereto as Exhibit 336 is a true and correct copy of the Declaration of David Beckelman, dated September 15, 2013.
- 338. Attached hereto as Exhibit 337 is a true and correct copy of the complaint dated October 26, 2006, filed in *New York v. Coventry First LLC*, No. 404620/06.
- 339. Attached hereto as Exhibit 338 is a true and correct copy of the article NY AG, Coventry Settle On Life Insurance Buy-Outs, Law 360 (Oct. 3, 2009), *available at* http://www.law360.com/articles/126211/ny-ag-coventry-settle-on-life-insurance-buy-outs.
- 340. Attached hereto as Exhibit 339 is a true and correct copy of the Notice and Order to Show Cause, dated May 7, 2007, as filed in *In the Matter of Coventry First LLC*, No. 88270-06, State of Florida Office of Insurance Regulation.
- 341. Attached hereto as Exhibit 340 is a true and correct copy of a press release dated October 1, 2006, from the Florida Office of Insurance Regulation entitled "Florida Insurance Commissioner Announces Settlement with Viatical Provider," *available at* http://www.floir.com/pressreleases/ViewMediaRelease.aspx?ID=1598.

342. Attached hereto as Exhibit 341 is a true and correct copy of excerpts of the complaint dated December 6, 2010, filed in *Griswold et al. v. Coventry First LLC*, et al., No. 1:10-CV-05694 (E.D. Pa.).

Jeffersøn E. Bell